



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

16 October 1996

Mr. Al Haring
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

RE: Site 09 - Allen Harbor Landfill,
Naval Construction Battalion Center, Davisville, RI.

Dear Mr. Haring:

The Rhode Island Department of Environmental Management (RIDEM) has completed its review of the Draft Final Proposed Plan for Site 09, the Allen Harbor Landfill, located at the former Naval Construction Battalion Center in Davisville, Rhode Island. Please find attached our specific comments on the draft document.

As you may be aware, comments on this document were purposely withheld due to our concern that the Navy was withdrawing its commitment to proceed with the preferred alternative as described in the plan. However, while we are still uncertain as to the Navy's intended direction, we have decided to submit our comments with the hope that the Navy will honor its previous commitments to this site and continue to move forward with this project. Please note that our comments were not being withheld as a result of a potential disagreement over the selected remedy, rather, we did not want to commit resources to reviewing a document that was not representative of your intended course of action and was therefore subject to change. As we have previously stated, if the Navy wishes to select a different alternative than they should do so and we can then resolve the matter through dispute resolution as provided for by the Federal Facilities Agreement. To continue in a manner in which the preferred alternative is selected and criticized in the same document or is being assessed through a parallel review process is damaging to the process.

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While RIDEM is still not entirely satisfied with all of the language modifications, we do appreciate your attempt to revise the document by removing biased language and make it more reflective of a proper Proposed Plan.

Thank you for your anticipated cooperation in addressing these remaining comments and concerns. Please contact Richard Gottlieb or me if you should have any questions regarding the attached.

Sincerely,

A handwritten signature in cursive script that reads "W. S. Angell II".

Warren S. Angell II, Supervising Engineer
Office of Waste Management

cc: M. Cohen, ToNK
R. Gottlieb, RIDEM/OWM
T. Gray, RIDEM/OWM
M. Sanderson, EPA

**Proposed Plan
Site 09 - Allen Harbor Landfill
Naval Construction Battalion Center
Davisville, Rhode Island**

- 1. Page 1, Section 1, Navy Proposes remedial plan for Allen harbor Landfill; Paragraph 2.**

This paragraph states the Navy's preference for a soil cap for the Allen Harbor Landfill. As noted on page 22, the soil cap alternative would not meet Federal or State ARARs and therefore cannot be the preferred alternative. To avoid confusing the public this paragraph should be removed from the text.

- 2. Page 7, Section 3.2, Site History; Paragraph 1, Last Sentence.**

This sentence is a note to the reviewer indicating the Navy's consideration of using photographs of Allen Harbor Landfill in the Proposed Plan. RIDEM agrees that this would be very helpful in communicating conditions at the site to the public.

- 3. Page 8, Section 3.4.3, Fate and Transport of COC; Paragraph 1.**

See RIDEM comment number 11 of 1 July 1996 regarding this section. This draft does not address our concern.

- 4. Page 10, Section 3.4.6, Evaluation of Potential Future Risks;**

See RIDEM comment number 12 of 1 July 1996. Comment not addressed.

- 5. Page 14, Section 3.4.6, Evaluation of Potential Future Risk; Paragraph 3, Sentence 1.**

For a complete discussion of potential future risk posed by ground water at Site 09, please refer to the Phase III Site 09 RI.

Please change "For a complete discussion of potential future risk" to "For a discussion of risk evaluated to date". This change is requested since the groundwater investigations will continue into the design phase. Currently, we do not have a "complete" investigation.

- 6. Page 16, Section 3.8, Summary of the Comparative Analysis of Alternatives; Paragraph 1, Sentence 1.**

See RIDEM comment number 24 of 1 July 1996 which was as follows:

Alternative 4 would also be protective of human health and the environment but the conclusions of the RI and ecological risk assessments do not indicate that minimization of ground-water flow through the site is necessary to reduce potential risk to Allen Harbor.

Based upon current information, RIDEM does not concur with this statement. As discussed at the 6 May 1996 BCT meeting additional sampling will be required before it can be concluded that groundwater is not causing contamination of Allen Harbor or the near- shore sediments. We anticipate that this additional sampling will include a geophysical survey of portions of the harbor followed by bores to confirm the findings of the geophysical survey. We also anticipate that in addition to resampling of wells on the landfill, that sampling in the harbor will take place.

These activities will serve two purposes. First, they will aid in confirming or denying the presence of contamination in the harbor and second, they will assist in validation of the modeling conducted at the site.

If the Navy is unwilling to commit to obtaining this information prior to submittal of the 30% remedial design then RIDEM will only support Alternative 4.

Please remove this statement or modify to reflect known conditions and limitations.

7. Page 18, 3.8, Summary of the Comparative Analysis of Alternatives; Paragraph 2, last sentence.

See RIDEM comment number 37 of 1 July 1996 which was as follows:

However, the landfill is sufficiently old (25 to 40 years) to have allowed stabilization of the fill materials to the extent that there is expected to be little residual risk related to continued ground-water migration.

RIDEM does not concur with this statement. Please strike it from the document.

The revised language in this draft still does not adequately address our concerns. We recommend that it be stricken from future documents.

8. Page 21, Section 3.8, Summary of the Comparative Analysis of Alternatives; Paragraph 1, Last Sentence.

The multimedia cap constructed under Alternatives 3 and 4 would have the effect of minimizing the contact of fill material with infiltrating precipitation (i.e., substantially reducing the potential for leaching of fill constituents into ground water), thereby providing an additional reduction in potential ground-water risk, which in the Navy's estimation is low.

Please remove the phrase "which in the Navy's estimation is low" since we are still investigating the risk of groundwater to the area.

9. Page 21, Section 3.8, Summary of the Comparative Analysis of Alternatives; Paragraph 2 & 3.

Please note in these paragraphs that Alternative 2 does not meet Federal and State ARARs.

10. Page 25, Section 3.8, Summary of the Comparative Analysis of Alternatives; Item 6, Implementability, Paragraph 2.

Please note in this paragraph that while it is technically feasible to implement Alternative 2, it does not meet ARARs and is not adequately protective of human health and the environment, therefore, it cannot be implemented.

11. Page 28, Section 4, For More Information; Address for RIDEM.

Please change "291 Promenade Street" to "235 Promenade Street", in addition delete the -5767 from the zip code until a new one is determined.

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